



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

August 6, 2021

BY CM/ECF

The Honorable Paul G. Gardephe
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: United States v. Tuzman
S8 15 Cr. 536 (PGG)

Dear Judge Gardephe:

The Government writes pursuant to the Court's July 29, 2021 Order regarding forfeiture and restitution as to defendant Kaleil Isaza Tuzman.

The Government and defense counsel have conferred and reached agreement as to a preliminary order of forfeiture, on consent, for a total of \$288,000. This amount reflects (a) the \$250,000 in KIT digital assets that Mr. Isaza Tuzman caused the company to invest in Maiden Capital in 2011, plus (b) the \$38,000 in profit that Maiden Capital paid to Mr. Isaza Tuzman when he redeemed his personal investment in Maiden Capital. (*See* PSR ¶ 91). A draft consent order of forfeiture is attached; the parties will execute it at sentencing.

The Government has determined not to seek restitution as to Mr. Isaza Tuzman, as there are no identified victims with respect to any of the counts of conviction, and no claims for restitution have been filed or sought.

Respectfully submitted,

AUDREY STRAUSS
United States Attorney

By: /s/
Andrea M. Griswold
Joshua A. Naftalis
Daniel M. Tracer
Assistant United States Attorneys
(212) 637-2200

cc: Avi Weitzman, Esq.